BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C. 20554

In the Matter of)
)	
Amendment of Part 90 of the Commission R	ules) WP Docket No. 07-100
)	

COMMENTS OF THE ZION FIRE RESCUE DEPARTMENT

I. INTRODUCTION

The Zion Fire Rescue Department provide these comments regarding the above captioned matters addressed in the Notice of Proposed Rulemaking, FCC 07-85, adopted by the Commission on May 9, 2007.

II. DISCUSSION

Currently, the frequencies used in our area are shared by users that all use tone and voice paging. It is understood that these frequencies are used for dispatch, and extensive use of these frequencies is not recommended for fireground or onscene communications. All users are licensed on fireground frequencies for that radio traffic.

Paragraph 4. The Zion Fire Rescue Department has a long history of using paging on the voice channels. This is done for alerting primary responding units, alerting auto and mutual aid units, alerting on duty personnel to return from various duty related non-emergent assignments, alerting off duty personnel to respond, and making announcements of interest to surrounding departments or personnel. Eliminating or restricting the use of paging on the voice channels would be detrimental to the Zion Fire Rescue Department. The FCC acknowledges that "paging and voice operations can generally co-exist on the same channel in the same area, provided the paging transmissions are infrequent (low traffic volume) and the paging licensee monitors the channel prior to transmitting."

Paragraph #5 comments: Paging on mutual aid frequencies in Illinois is critically important. The Illinois Fire Service has a state-wide fire mutual aid system that uses a common frequency (154.265 MHz) which uses radio frequency paging for notification of alarm activation and units due to respond. The system called the Mutual Aid Box Alarm System (MABAS) is recognized as a model for fire service mutual aid and is being copied by other states to facilitate the sharing of resources

for fire and rescue emergencies. The elimination or restriction of paging on the mutual aid frequencies would severely impact this operation across the state.

The other frequency that is mentioned by the FCC is the MERCI channel (155.340 MHz). Paging on this frequency is primarily done by hospitals.

Paragraph 6 comments: The fire service in Illinois has a long history of using paging on the voice channels. This is done for alerting primary responding units, alerting auto and mutual aid units, alerting on duty personnel to return from various duty related non-emergent assignments, alerting off duty personnel to respond, and making announcements of interest to surrounding departments or personnel. Eliminating or restricting the use of paging on the voice channels would be detrimental to Zion Fire Rescue Department. In a majority of cases the paging is used by a large portion of the volunteer departments that would find it financially impossible to implement other more costly commercial based systems that are less effective for alerting our members. If the FCC follows throught with this change, it will cost the Zion Fire Rescue Department thousands of dollars that we do not have in our budget.

Paging on mutual aid frequencies in Illinois is critically important and should be maintained as an option on the voice channels. The Illinois Fire Service has a state-wide fire mutual aid system that uses a common frequency (154.265 MHz) which uses radio frequency paging for notification of alarm activation and units due to respond. The system called the Mutual Aid Box Alarm System (MABAS) is recognized as a model for fire service mutual aid and is being copied by other states to facilitate the sharing of resources for fire and rescue emergencies. The elimination or restriction of paging on the mutual aid frequencies would severely impact this operation across the state of Illinois and other surrounding states.

III. CONCLUSION

In summary, the proposed changes that the FCC has announced would have devastating effects to The Zion Fire Rescue Department and the surrounding departments. To say that this would hurt us only financially would understate the effect that this will have on public safety. We urge the FCC to reconsider this proposed change.

Respectfully Submitted,

Eric T. Troy, Communications Coordinator Zion Fire Rescue Department Eric T. Troy
Zion Fire Rescue Department
2828 Sheridan Road
Zion, IL 60099
(847)746-4040
erict@zion.il.us